

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CRIMINAL NO. 2: 14-cr-20239
HON. ARTHUR J. TARNOW

EDWARD BELCZAK,
JANICE VERSCHUREN,

Defendant.

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STIPULATION FOR AN EXTENSION OF ALL SCHEDULED DATES

The parties, by and through their respective counsel, stipulate to extending the deadline for filing motions from April 15, 2015 to July 15, 2015, extending the final pretrial conference and motion hearing from May 20, 2015 to August 20, 2015, and an extension of the acceptance of the Rule 11 Plea Agreement to July 1, 2015. Said

extension is requested due to the fact that undersigned counsel has just recently filed his Appearance on March 25, 2015 on behalf of Defendant Janice Verschuren. As such, undersigned counsel needs to obtain all of the discovery materials from prior counsel, ensure that he has all of the discovery that is available from the United States Attorney's Office, review and analyze that discovery, review the discovery and any offered Rule 11 Plea Agreement with his client, etc., and otherwise conduct due diligence in defending Ms. Verschuren.

It is further stipulated and agreed by the parties that the delay caused by this adjournment is excludable delay under the provisions of 18 U.S.C. § 3161(h)(1) and (7)(A) in that the parties request further time to prepare for trial and explore plea negotiations and the ends of justice are served by this delay and outweigh the best interests of the public and the Defendants in a speedy trial.

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ORDER EXTENDING SCHEDULING DATES

The Court, after reading the Stipulation signed by Counsel and otherwise being fully advised of the premises herein, further finding that pursuant to 18 U.S.C. §3161(h)(1) that the newly substituted counsel needs a reasonable amount of time for discovery review and efforts toward plea negotiations, which constitute excusable delay under the Speedy Trial Act, and that pursuant to 18 U.S.C. 3161 (h)(7)(A), the ends of justice are served by granting the requested continuance for the reason stated in the stipulation, which reasons outweigh the best interest of the public and the Defendant in a speedy trial.

IT IS HEREBY ORDERED that the deadline for filing motions shall be extended to July 15, 2015, the final pretrial conference and motion hearing shall be extended to August 20, 2015, at 2:00 p.m. and the acceptance of the Rule 11 Plea Agreement shall be extended to July 1, 2015.

IT IS FURTHER ORDERED that this extension shall constitute excludable delay under 18 U.S.C. Sect. 3161(h)(1) and Sect. 3161 (h)(7)(A) of the Speedy Trial Act.

s/Arthur J. Tarnow
Hon. Arthur J. Tarnow
U.S. District Court Judge

DATE: April 10, 2015